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*Date:* December 19, 2008  
*Refer To:* EP2008-0538

James P. Bearzi, Bureau Chief  
 Hazardous Waste Bureau  
 New Mexico Environment Department  
 2905 Rodeo Park Drive East, Building 1  
 Santa Fe, NM 87505-6303

**Subject: Response to Direction to Proceed with Well R-22 Rehabilitation and Request for Extension**

**References: (1) Letter, Bearzi to Messrs. Gregory and McInroy, 09/29/08  
 (2) Letter, Bearzi to Messrs. Gregory and McInroy, 12/07/07**

Dear Mr. Bearzi:

The U.S. Department of Energy and Los Alamos National Security, LLC (collectively, the Permittees) are in receipt of the New Mexico Environment Department's (NMED's) letter of September 29, 2008, that provided direction to proceed with the rehabilitation of well R-22 (reference 1). NMED's letter stipulates the rehabilitation and report summarizing the results of rehabilitation must be complete by January 31, 2009, before results are available from the new wells that will be drilled around Material Disposal Area G (R-39 and R-41). Previously, NMED wanted to postpone rehabilitation of R-22 until after wells R-39 and R-41 were installed (reference 2).

Initially, Los Alamos National Laboratory (the Laboratory) scheduled R-22 rehabilitation in the fiscal year 2009 (FY2009) work plan to coincide with the order of events described in reference 2. Upon receiving reference 1, the Laboratory revised the FY2009 plan such that R-22 would be rehabilitated before drilling of R-39 and R-41 was completed. However, hydrologic data collected after R-39 was drilled indicated we could have a better understanding of the hydrologic communication between wells in Technical Area 54 after R-41 was drilled. We discussed this finding with your staff on November 19, 2008, and obtained verbal agreement.

For the above technical reason, we request an extension of R-22 activities. We propose to begin activities at R-22 on April 1, 2009, immediately after field completion of R-41. NMED is aware the plan for R-22 calls for removing the Westbay sampling system, conducting aquifer yield testing of the screened intervals to be retained (screens 2 and 3), redeveloping these intervals, and isolating screens 1, 4, and 5. Testing is required before the optimum sampling system can be selected. Furthermore, as NMED is aware, extra caution must be exerted to minimize cross-communication

between screens during redevelopment activities. In addition, we plan to pump screens 1 and 5 before their isolation to collect and analyze solids from screen 1 and to obtain more information about the lingering tritium at screen 5. We therefore propose submitting the summary report of well rehabilitation activities on June 30, 2009, thereby allowing 2 months for field work and 1 month for data analysis and reporting. At NMED's request, we will provide a work plan describing all activities and a detailed schedule by January 30, 2009.

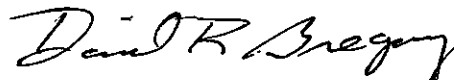
If you have any questions, please contact Ardyth Simmons at (505) 665-3935 (asimmons@lanl.gov) or Hai Shen at (505) 665-5046 (hshen@doeal.gov).

Sincerely,



Michael J. Graham, Associate Director  
Environmental Programs  
Los Alamos National Laboratory

Sincerely,



David R. Gregory, Project Director  
Environmental Operations  
Los Alamos Site Office

MG/DG/PH/AS:sm

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EP-LWSP File, MS M992  
RPF, MS M707  
IRM-RMMSO, MS A150 (date-stamped letter emailed)